Remarks

Claims 1-41 are currently pending and stand rejected. Applicants assert that the claims are now in condition for allowance as set forth more fully below. Applicants request that the finality of the current rejection be withdrawn and/or that a Notice of Allowability be provided.

Interview Summary

The undersigned participated in a telephone interview with the Examiner June 2005. During the interview, deficiencies in the Sitaraman reference were discussed relative to subject matter of the present application. Namely, it was discussed that Sitaraman discloses a transfer from a source database system to a target database system where during the transfer, a target adapter receives the data from a source adapter and converts the data to a different format when transferring it to the target database system. It was further discussed that the manipulated data is not transferred back to the source database system as the converted data is put into a format compatible with the target database system and is not compatible with the source such that there is also no reason to return it to the source. The Examiner suggested that the source and the target could be one in the same so that the converted data was actually being returned to the source, but the undersigned disputed that such was the case.

102 Rejections

Claims 1, 2, 10-11, 19-20, 31,32, 37-38, and 40 stand rejected under 35 USC 102(e) as being anticipated by Sitaraman et al (US Pat. 6,085,030). The Office Action states that Sitaraman discloses all of the elements of these claims. Applicants respectfully traverse these rejections.

Each of the independent claims provide for an application server or other computer generating a request for data manipulation that includes the data to be manipulated and then the manipulated data is returned to the computer that has generated the request. As a representative example, claim 1 recites at least one client application server that utilizes data in a form other than an initial form and generates a manipulation request for manipulation of the data from the initial form wherein the request includes the data in the initial form. Claim 1 further recites an application server accessible by a plurality of client application servers via a plurality of application software protocols,

wherein said application server provides a data manipulation service on the data received from the client application server in response to receiving the manipulation request from the client application server and wherein the data manipulation service causes a change to the data to the form other than the initial form <u>and returns the changed data to the client application server</u>. Additionally, claim 1 recites a storage mass coupled to said application server for storing a system of dynamically maintainable manipulation functions for performing said manipulation service.

Sitaraman fails to disclose all of these elements. Sitaraman is concerned with a source database system attempting to transfer data to a target database system. Because the source database system has the data in a format different than what is useful to the target computer, the data is converted from one format to another by a converter of a target adapter once it is sent from a source adapter to the target adapter. Once converted, it is provided to the target database system by the target adapter. At no point does one system request manipulation and send the data to be manipulated with the request and then the manipulated data is returned to the system that sent the request.

Furthermore, the context of Sitaraman dictates that the source database system and the target database system and not one and the same. It is explicitly described as two different systems, with each one utilizing data in a different format, and where each one communicates via the adapters over a network connection such as an intranet connection or the Internet. It is illogical based on the described context of Sitaraman that the source and target systems are the same.

Because Sitaraman fails to disclose each and every element of the independent claims, all claims 1-41 are allowable over Sitaraman for at least these reasons. Dependent claims depend from an allowable base claim and are also allowable for at least the same reasons.

<u>103 Rejections</u>

Claims 3-9, 12-18, 21-35, and 39 are rejected under 35 USC 103(a) as being unpatentable over Sitaraman in view of Whitehead (US Pat 6,085,030). Claims 36 and 41 are rejected under 35 USC 103(a) as being unpatentable over Sitaraman in view of Allen (US Pat 6, 078,918). Applicants respectfully traverse these rejections.

3

As discussed above, all claims provide for that the manipulated data is returned to that which has sent the request for manipulation along with the data to be manipulated. In relation to claim 36, it specifically recites, in part,   means for <u>receiving a service request from a customer</u>, the customer requesting data that is in an initial form to be manipulated into a form other than the initial form and passing data to said system in the form of hashtables,...and means for sending a manipulation result including the changed data from the application server <u>to said customer</u> based at least in part on the manipulation request.

As discussed above, Sitaraman does not provide for returning the converted data to the source system that is transferring the data, and the source system and the target system are not one and the same. Furthermore, it is illogical based on the context of Sitaraman that the converted data would be returned to the source since the source utilizes data in the pre-conversion format. Furthermore, neither Whitehead nor Allen account for these deficiencies in Sitaraman such that claim 36 and these dependent claims are also allowable over the cited combinations for at least these reasons.
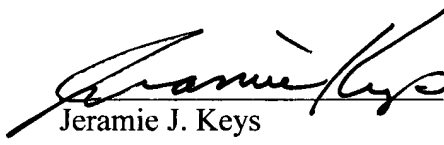

<u>Conclusion</u>

Applicants assert that the application including claims 1-41 is now in condition for allowance. Applicants request reconsideration in view of the amendments and remarks above and further request that a Notice of Allowability be provided. Should the Examiner have any questions, please contact the undersigned.

No fees are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

Date: June 20, 2005

Jeramie J. Keys
Reg. No. 42,724

Withers & Keys, LLC
P.O. Box 71355
Marietta, Ga 30007-1355
(404) 849.2093